

**AFFIDAVIT**

I, William P. Akins, a Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, depose and state:

**INTRODUCTION:**

1. I am a Postal Inspector with the United States Postal Inspection Service, in Tucson, AZ, and have been employed as such since February of 2019. Since February of 2019, I have been stationed at the Tucson, Arizona office of the Phoenix Division. I attended the fourteen-week training course at the United States Postal Inspection Service Academy in Potomac, Maryland. There I received training related to violations of federal law including assaults, robberies, and criminal investigations of narcotics trafficking via the United States Mail. Prior to becoming a Postal Inspector, I was employed as a United States Border Patrol Agent for approximately 13 years. Throughout my law enforcement career, I have had extensive training and experience investigating a variety of criminal violations including controlled substances. During my almost 16-year career as a Federal Law Enforcement Officer, I have been involved in numerous criminal investigations which have resulted in arrests, recovery of evidence and seizure of property. I have also written and executed numerous search warrants resulting in the seizure of thousands of dollars and controlled substances.

**DESCRIPTION OF SUBJECT PARCEL:**

2. This affidavit is made in support of an Application and Affidavit for Search Warrant for a United States Postal Service (USPS) Priority Mail (PM) parcel.

The parcel has tracking number 9405 5118 9956 0485 4314 36, with a prepaid Stamps.com postage from a UPS Store, postmarked from New Rochelle, New York on December 2, 2021. It bears a return address of “salesian high school, george janvier, 148 e main st, NEW ROCHELLE NY 10801-5711” and is addressed to “DANIEL CONTERAS, 4481 S CALLE DON DOMENICO, TUCSON AZ, 85746-8457”. The article consists of a brown mailing carton measuring approximately 10” x 8” x 6” and weighing approximately 7 pounds. It is hereafter referred to as “SUBJECT PARCEL 1”.

**BACKGROUND ON USPS DRUG INTERDICTION IN SOUTHERN ARIZONA  
AND THE USPS DRUG MAIL PROFILING PROGRAM:**

3. From my training, personal experience, and the collective experiences related to me by other Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and the proceeds from the sale of controlled substances, I am aware that the southern Arizona international border is a leading area for the entry of controlled substances from Mexico into the U.S. Based on the large quantities of controlled substances entering southern Arizona, controlled substances are frequently transported from southern Arizona via the United States Mail to areas across the United States, primarily to the large metropolitan areas in the eastern United States and Puerto Rico. It is also common for the proceeds from the sale of the controlled substances to be sent to southern Arizona via the United States Mail. By using the U.S. Mail to ship controlled substances, these drug

traffickers put unknowing postal employees who handle and deliver those mailings at risk.

4. Based on the frequent use of the United States Mail for the shipment of controlled substances from southern Arizona and California, Postal Inspectors in Tucson and other locations near the southwest border routinely observe inbound and outbound mail articles for suspicious characteristics common to mailings of drugs and drug proceeds. While there are many characteristics that experienced inspectors look for, the most common characteristics found are:
  - a. Suspected parcels are mailed to or from known drug destination areas, primarily the large metropolitan areas in United States and Puerto Rico.
  - b. The sender names and addresses on drug or drug proceeds parcels routinely contain misspellings, incomplete, inaccurate, unauthorized and/or fictitious information.
  - c. A tracking number is used to provide the trafficker the ability to track the parcel's progress to the point of delivery.
  - d. The postage was paid in a manner which leaves no trail identifying the mailer.
5. Parcels found to meet some or all of the suspicious characteristics described in subsections "a" through "d" of this paragraph are further investigated by Postal Inspectors.

**INVESTIGATIVE DETAILS:**

6. On September 23, 2021, during ongoing interdiction activities in Tucson, AZ, I observed a parcel destined to “Daniel Contreras, 4481 S Calle Don Domenico, Tucson, AZ 85746”. It had a return address of “Najah Roberts, 4374 White Plains Rd, Bronx, NY 10466”. This parcel had characteristics common to mailings of drugs and drug proceeds, but I allowed the parcel to be delivered to further my investigation. The return address for this parcel is a business strip mall and not a residential address. From my experience, addresses belonging to businesses use a business name on the return label, not a person’s name.
7. On December 2, 2021, I was made aware SUBJECT PARCEL 1 was mailed from New York. On December 4, 2021, I contacted the local post office to have SUBJECT PARCEL 1 held from delivery and set aside for further examination.
8. On December 6, 2021, I received and observed SUBJECT PARCEL 1 from the local post office.
  - a. It was mailed from New Rochelle, New York, which is an area I know to be a destination for drug parcels and a source area for proceeds from the sale of those drugs.
  - b. It has a tracking number. From my experience, I know that nearly all drug and drug proceeds parcels bear tracking numbers allowing the sender and receiver to track the progress of the shipment from origination to destination.

- c. There are no telephone number listed on the mailing label for the addressee or sender. In my experience, legitimate mailers who use the USPS Priority Mail expedited service regularly include telephone numbers in the spaces provided on the label because they paid a premium price for the service and want to be contacted to help facilitate a timely delivery should a problem arise.
  - d. The subject parcel was paid for in a manner to keep the anonymity of the sender from being identified by law enforcement. The mailer used postage from a UPS Store who printed the postage using Stamps.com.
9. I called Salesian High School in New Rochelle, New York and spoke to a school administrator. The administrator informed me George Janvier used to be employed at the school but died over a year ago. The administrator also told me she thought it was unusual the school address and his name would be used on a return label for a parcel destined to Tucson, Arizona.
10. Canine Examination:
- a. On December 6, 2021, at approximately 11:17 a.m., I met with Supervisory Border Patrol Agent Canine Handler Casey Haley and his canine partner Kuno. Agent Haley's canine is trained and certified to detect the odors of marijuana, heroin, cocaine, methamphetamine and their derivatives. I placed SUBJECT PARCEL 1 in a cleared area for examination by Agent Haley and Kuno. Agent Haley informed me at approximately 11:25 a.m. that Kuno alerted to SUBJECT PARCEL 1, indicating the presence of narcotics or a controlled substance, or other

evidence with an odor of narcotics or a controlled substance within the parcel.

11. Based on the facts set forth in this affidavit, I believe there is probable cause to show that SUBJECT PARCEL 1 contain controlled substances and/or proceeds from the sale of controlled substances, constituting evidence of violations of Title 21, United States Code, Sections 841 (a) (1), Possession with Intent to Distribute a Controlled Substance, and 843 (b), Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance.

12. This affidavit is submitted for the limited purpose of seeking authorization to search SUBJECT PARCEL 1. Your Affiant has not set forth each and every fact known to him regarding the investigation.

*William P. Akins*

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William P. Akins  
United States Postal Inspector

Subscribed and sworn to me telephonically on  
This 6<sup>th</sup> day of December, 2021

*Leslie A. Bowman*

Leslie A. Bowman  
United States Magistrate Judge